

UNITED STATES DISTRICT COURT

for the
Western District of WashingtonIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
SUBJECT ACCOUNT

Case No. MJ24-547

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SUBJECT ACCOUNT, more fully described in Attachment A, incorporated herein by reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18 U.S.C. §§ 2422(b), 2251
(a), 2252(a)(2), 2252(a)(4)(B)

Offense Description

Enticement of a Minor, Production/Receipt/Distribution/Possession of Child Pornography,
as well as attempt/conspiracy to commit such offenses

The application is based on these facts:

- ☒ See Affidavit continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.GARRETT M SAXTON
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Date: 2024.08.30 12:29:16 -07'00'

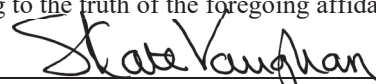
Applicant's signature

Garrett Saxton, Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 09/03/2024


Judge's signature

City and state: Seattle, Washington

S. KATE VAUGHAN, United States Magistrate Judge

Printed name and title

INTRODUCTION

2. As part of my current duties as an HSI Criminal Investigator, I investigate criminal violations relating to child exploitation and child pornography including violations of Title 18, United States Code, Sections 2251(a), 2252(a)(2), 2252(a)(4)(B), and 2243(a)(1). I have received training about child pornography and child exploitation, and have observed and reviewed numerous examples of child pornography in various forms of media, including media stored on digital media storage devices such as computers, tablets, cellphones, etc. I am a graduate of the Criminal Investigator Training Program ("CITP"), and the HSI Special Agent Training ("HSISAT") at the Federal Law Enforcement Training Center in Glynco, Georgia.

PURPOSE OF THE AFFIDAVIT

3. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that are stored at premises controlled by Airbnb, Inc., an online electronic and remote cloud storage service located at 888 Brannan Street, 4th Floor, San Francisco, CA 94103. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Airbnb, Inc., to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

4. The facts set forth in this Affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training, experience, and research. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation. I have set forth only the facts that I believe are relevant to the determination of probable cause to believe that evidence, fruits, and instrumentalities in violation of federal law will be found in the Airbnb account of RICHARD MANESS (XX/XX/1987) associated with email **tonalsoul@gmail.com** (hereafter the “SUBJECT ACCOUNT”).

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2422(b) (Enticement of a Minor), 18 U.S.C. § 2251(a), (e) (Production of Child Pornography), 18 U.S.C. § 2252(a)(2), (b)(1) (Receipt/Distribution of Child Pornography), and 18 U.S.C. §

2252(a)(4)(B), (b)(2) (Possession of Child Pornography), as well as attempt/conspiracy to commit those offenses (hereinafter the “TARGET OFFENSES”), have been committed by RICHARD MANESS while utilizing the SUBJECT ACCOUNT. There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband or fruits of these crimes further described in Attachment B.

THE INVESTIGATION

6. In June 2024, Vietnamese law enforcement sought assistance from U.S. law enforcement related to an ongoing child exploitation investigation. According to records obtained from Vietnam, in April 2024, Richard Stanley MANESS Jr. (DOB XX/XX/1987) (the SUBJECT PERSON), conspired with a Vietnamese national (S1) to arrange for the sexual assault of children and the creation of child sexual abuse imagery.

7. According to reports from foreign law enforcement, S1 met MANESS on a Vietnamese dating app. And in November 2023, MANESS went to Vietnam to meet S1 in person. After returning to the United States in December 2023, MANESS continued chatting with S1 via the Zalo social media application.¹

8. Vietnamese law enforcement’s investigation revealed that S1 abducted two young girls (MV1 and MV2) and kept them at an Airbnb rented by MANESS from April 3 through April 8, 2024. Messages exchanged between S1 and MANESS on Zalo during this period show S1 sexually abusing these children at MANESS’s direction and sending him child sexual abuse imagery, among other things.

9. Vietnamese authorities provided screenshots of Zalo chats between S1 and MANESS, which I have reviewed and summarize below:

- Around April 3, 2024, MANESS sent S1 the following: “You rush me, you’re supposed to find the girl and we agree then get condo...lol but you got her already... Let me find okay... I will book for you... While I’m looking... continue to take pictures with her.” Soon after, he provided S1 instructions on how to get into an apartment that records show he booked

¹ Zalo is a social media application, available for both smartphones and computers, that offers a variety of features to include instant messaging and group chat, multimedia sharing, and hotel booking.

1 through Airbnb on April 3, 2024: “The room is 10.05... Enter the
2 combination... Then when you get to the door, to go inside the combo is
3 938299533#.”

- 4 • S1 then began sending pictures and videos of MV1 and MV2 in the nude.
5 It appears from the chats that MANESS was primarily interested in
6 imagery of MV1, as there is little discussion of MV2 in the chats.
- 7 • On April 5, MANESS sent S1 pictures of women in sexual poses in which
8 they were bent over and exposing their anuses/genitals and said, “Make her
9 do this, that’s what I described. Then, she can earn games... Bend over and
10 open... I love that... Because she’ll need to learn to bend over and open up
11 for daddy, because she’ll will do that for me whenever I want to fuck her.
12 Same for you, bend over baby.”
- 13 • Thereafter, S1 sent MANNESS six pictures of MV1. The photos show
14 MV1 bending over while nude, her hands resting on the floor, with the
15 pictures being taken from behind and the focal point on MV1’s
16 buttocks/genitals. In one of the photos, which is focused even more
17 closely on MV1’s buttocks/genitals, a hand is spreading her buttocks and
18 clearly exposing her anus to the camera. MV1’s pose appears to be
19 consistent with the imagery MANESS sent of other women described
20 above.
- 21 • MANESS also sent S1 the following message: “The days are slow because
22 I’m waiting... It is worse waiting now because I have ticket and I know
23 when I’ll see [you]...Only few more days... then we can watch tv together
24 and fuck and relax at home and fuck [MV1] a lot and we will be happy
25 together even if we don’t go out.”
- 26 • In a separate chat, MANESS was even more explicit about his intentions.
27 S1 messaged MANESS asking, “will you make [MV1] cry?” to which
MANESS replied, “It’s not my plan... But maybe she will cry when she
gets fucked? I don’t know... I think she may not cry if you practice making

1 her pussy and ass bigger with your fingers or toys before I arrive... Are
 2 you worried I will make her cry?" S1 responded, "no, I want to see you
 3 make her cry hahaha... She won't dare cry, she's very afraid of me."

4 MANESS then responded, "If you want her to cry, hold her still while I
 5 fuck her ass... I can if you want... But it wasn't my plan, my plan is to
 6 fuck her, idk if she will cry... But she will learn to take a big dick and
 7 submit to me... Do you want me to fuck [MV1] hard?" S1 responded,
 8 "yes."

- 9 • On April 5, 2024, S1 sent MANESS a photo of MV1 holding a cylindrical
 10 object in her hand and putting the object in her mouth. After sending this
 11 photo, S1 stated, "Maybe she hasn't mastered this yet... That was my
 12 bottle of lubricant when I used it on the girl whose ass I fucked." On April
 13 6, 2024, S1 sent more depictions of MV1. In these depictions, MV1 is
 14 lying down in the nude with a bottle of lubricant in her mouth. In some of
 15 the images, an apparent adult hand is holding MV1's thigh, as to expose
 16 her genitalia. MANESS responded, "I love it... She's learning well... I'm
 17 excited for her to suck my dick... I bought some lubricant that helps to
 18 reduce pain, so I can also use that on her later to fuck... Did you try yet to
 19 stick your fingers insider her pussy? I think maybe she's not a virgin
 anymore once you put your fingers inside."

- 20 • On April 7, 2024, S1 sent MANESS more visual depictions of MV1.
 21 MV1's face is visible in two of them, but the remainder are focused on her
 22 genitals. An apparent adult hand is touching MV1's genitals in several of
 23 the visual depictions. After sending this imagery, S1 sent the following:
 24 "It's hard to get it in, so I can't get my finger in yet... she cried... idk , I
 25 don't know what to do." MANESS responded, "Thank you for all the
 26 great videos... Her pussy is very small, it takes a lot of training to make it
 27 big enough to fuck. Remember to use lube and make sure your finger nails

1 are removed so your finger is soft. Or, you can find other soft things to
2 use.”

3 10. Based on MV1’s youthful appearance, lack of pubic/body hair, lack of
4 muscular/pubis development, and small stature, it is apparent she is prepubescent. I
5 estimate MV1 is between 4 and 8 years old.

6 11. On April 8, 2024, Vietnamese law enforcement identified the apartment
7 where S1 was keeping these children at 92 Nguyen Huu Canh, Ward 22, Binh Thanh
8 District, Apartment 10.05, Ho Chi Minh City, Vietnam. They interviewed S1, and she
9 confessed to the abduction and abuse of these two minors.

10 12. In the screenshots provided by Vietnamese law enforcement, the username
11 visible for MANESS’s Zalo account is visible and displayed as “RichardManess”.

12 13. Vietnamese law enforcement also provided a screenshot of the account
13 used to book the Airbnb. The name for the account is displayed as “Richard” and the
14 profile photo is a Caucasian male wearing a hat and sunglasses. I have reviewed
15 MANESS’s driver’s license photo provided by the Washington Department of Licensing
16 and noted that MANESS is also a Caucasian male. The visible facial features of the two
17 men depicted in each photo are consistent, though I cannot say definitively they depict
18 the same person. The Airbnb screenshot also shows a small list of descriptors for the
19 profile user, including the statement: “Born in the 80s”

20 14. I located travel records showing that MANESS travelled from Seattle to Ho
21 Chi Minh City, Vietnam, on November 23, 2023. He returned to Seattle on December 3.

22 15. I also located a phone number associated with MANESS and currently
23 assigned to T-Mobile. Subscriber records provided by T-Mobile show that this phone
24 number, (360) 421-3260, belongs to an account in MANESS’s name.

25 16. Consistent with the information provided by Vietnamese law enforcement,
26 I located an Airbnb account in MANESS’s name that is also linked to the phone number
27 above and the email “tonalsoul@gmail.com”. Records provided by Airbnb show that this

1 account booked a rental at 92 Nguyen Huu Canh, Binh Thanh, Ho chi Minh², Vietnam,
2 for seventeen nights starting April 3, 2024, which was paid for using Apple Pay.

3 17. Among the information provided by Vietnamese law enforcement was a
4 screenshot of an email from Airbnb to the host who owns the condo MANESS rented.
5 The email indicates “Richard” cancelled the remaining days of the booking. The email
6 contains a confirmation for the booking, which is the same confirmation number for the
7 reservation contained in the records provided by Airbnb described in the preceding
8 paragraph. Airbnb records reflect that MANESS was initially charged \$860.23 for this
9 reservation and was refunded \$439.

10 18. These records also included screenshots of apparent chats between the
11 Airbnb host and the renter. The renter is identified as “Richard.” In the chats, Richard
12 tells the host that no housekeeping will be necessary during the rental period and that his
13 fiancé will take care of cleaning. Richard also told the host that he was not currently in
14 Vietnam but was planning to travel there.

15 19. Of note, the chats between MANESS and S1 included messages where
16 MANESS told S1 to ensure no one entered the condo where she and the children were
17 staying. He said she would need to stay inside the condo during daytime hours and only
18 go out at night.

19 20. My initial investigation suggested that MANESS was living in an
20 apartment in Kenmore, Washington. In late July, I learned that MANESS moved out of
21 that apartment in March 2024. I located a change of address form showing that
22 MANESS directed the U.S. Postal Service to forward his mail to an address in California,
23 which I determined to be his parents’ home.

24 21. On August 6, 2024, I sent Apple a summons for information relating to
25 MANESS and any iCloud accounts associated with “tonalsoul@gmail.com”. Apple Inc.
26

27 ² Although this address does not have the Ward listed, like the report from Vietnamese law enforcement, it is
suspected that the two addresses are connected to the same residence. “Ward 22” is the township or commune where
the address is located. Ward 22 resides within the Binh Thanh district of Ho Chi Minh City, Vietnam.

1 provided iCloud³ information for all accounts associated with MANESS. Among these
2 accounts registered to MANESS was “richard.s.maness@gmail.com”,
3 “tonalsoul@gmail.com”, and an account with S1’s name:
4 “queen.[REDACTED]@gmail.com”. Apple also provided IP connection logs listing IP
5 addresses that had been used to connect to these accounts. Law enforcement indices
6 showed that seven of the IP addresses used to connect to the “tonalsoul@gmail.com”
7 iCloud account between July 15, and August 5, 2024, belonged to Comcast.

8 22. On August 21, 2024, Comcast provided subscriber information associated
9 with these IP addresses that at the time they were used to connect to the above iCloud
10 account, they were assigned to BW with a service address at the SUBJECT PREMISES.

11 23. On August 21, 2024, I conducted surveillance at the SUBJECT
12 PREMISES, I saw the door of the SUBJECT PREMISES rustle as if someone were
13 preparing to open the door from the inside at which point I walked back towards the
14 elevator out of sight of the door. I heard an individual leave the apartment and walk
15 towards the elevator. I recognized this person as MANESS.

16 24. I applied for warrants to search MANESS’s person and this residence,
17 which federal and local law enforcement executed on the morning of August 28, 2024. I
18 encountered MANESS in the home and asked if he would speak with me. He invoked his
19 rights, and I did not question him further.

20 25. Agents interviewed BW, who was present in the home. BW confirmed she
21 and MANESS had been dating since May and that they initially met online. She
22 explained that MANESS has been transient for the last few months, often staying at
23 hotels around King County and began staying with her in her home more consistently
24 over the last few weeks.

25 26. BW also reported that MANESS has a storage unit but was unaware of its
26 location. BW identified MANESS’s car, a Hyundai SUV. The car is not registered to
27 him, but BW reported that he inherited it from a deceased relative.

³ iCloud is the service from Apple that securely stores your photos, files, notes, passwords, and other data in the cloud and keeps it up to date across all your devices automatically.

1 27. During the search, agents located financial records showing significant
2 financial transactions from accounts associated with MANESS to unidentified
3 individual(s) in Vietnam.

4 28. Agents also seized several digital devices, including a smartphone, laptop
5 computer, and an external storage device. The devices were encrypted and have been
6 transported to HSI Seattle for further examination.

7 **BACKGROUND CONCERNING ONLINE ACCOUNTS**

8 29. As explained herein, information stored in connection with an online
9 account may provide crucial evidence of the “who, what, why, when, where, and how” of
10 the criminal conduct under investigation, thus enabling the United States to establish and
11 prove each element or alternatively, to exclude the innocent from further suspicion.

12 30. In my training and experience, the information stored in connection with an
13 online account can indicate who has used or controlled the account. This “user
14 attribution” evidence is analogous to the search for “indicia of occupancy” while
15 executing a search warrant at a residence. For example, email communications, contacts
16 lists, and images sent (and the data associated with the foregoing, such as date and time)
17 may indicate who used or controlled the account at a relevant time.

18 31. Further, information maintained by the online provider can show how, when
19 and where the account was accessed or used. For example, as described below, online
20 providers typically log the Internet Protocol (IP) addresses from which users access an
21 account, along with the time and date of that access. By determining the physical location
22 associated with the logged IP addresses, investigators can understand the chronological
23 and geographic context of the online storage account access and use relating to the crime
24 under investigation. This geographic and timeline information may tend to either
25 inculcate or exculpate the account owner. Additionally, information stored at the user’s
26 account may further indicate the geographic location of the account user at a particular
27 time (e.g., location information integrated into an image or video sent via email).

 32. Stored electronic data may provide relevant insight into the online account
owner’s state of mind as it relates to the offense under investigation. For example,

1 information in the online storage account may indicate the owner's motive and intent to
 2 commit a crime (e.g., communications relating to the crime), or consciousness of guilt
 3 (e.g., deleting communications in an effort to conceal them from law enforcement).

4 **BACKGROUND CONCERNING AIRBNB, INC.**

5 33. From the internet and experience, I know that the company Airbnb, Inc.
 6 refers to an online site that is used for the purpose of booking short-term or long-term
 7 temporary housing. Users are required to enter personal identifying information such as
 8 name, address, driver's license or other form of official identification, credit card/billing
 9 information, a valid email address, etc. Users of Airbnb can search for available housing
 10 rentals based upon location, price, type of housing (apartment, single family home,
 11 condo, etc.), number of bedrooms, amenities, etc. Users of Airbnb search for available
 12 housing rentals based upon the availability of the desired dates. Same day booking is
 13 permissible. Users of Airbnb agree to site rules and rules that are established by the
 owner of the location they are securing. According to Airbnb's terms of service:

- 14 • 8.1.3 If you book a Host Service on behalf of additional guests, you are required
 15 to ensure that every additional guest meets any requirements set by the Host, and
 16 is made aware of and agrees to these Terms and any terms and conditions, rules
 17 and restrictions set by the Host. If you are booking for an additional guest who is
 18 a minor, you represent and warrant that you are legally authorized to act on behalf
 19 of the minor. Minors may only participate in an Experience, Event or other Host
 20 Service if accompanied by an adult who is responsible for them.
- 21 • 4.1 You are solely responsible for compliance with any and all laws, rules,
 22 regulations, and Tax obligations that may apply to your use of the Airbnb
 23 Platform. In connection with your use of the Airbnb Platform, you will not and
 24 will not assist or enable others to: Violate or infringe anyone else's rights or
 25 otherwise cause harm to anyone.

26 34. Online providers such as Airbnb typically retain certain transactional
 27 information about the creation and use of each account on their systems. This
 information can include the date on which the account was created, the length of service,
 records of log-in (i.e., session) times and durations, the types of service utilized, the
 status of the account (including whether the account is inactive or closed), the methods
 used to connect to the account, and other log files that reflect usage of the account. In
 addition, online storage providers often have records of the Internet Protocol address ("IP

1 address”) used to register the account and the IP addresses associated with particular
2 logins to the account. Because every device that connects to the internet must use an IP
3 address, IP address information can help to identify which computers or other devices
4 were used to access the account.

5 35. In some cases, Airbnb account users will communicate directly with Airbnb
6 about issues relating to the account, such as technical problems, billing inquiries, or
7 complaints from other users. Online providers typically retain records about such
8 communications, including records of contacts between the user and the provider’s
9 support services, as well records of any actions taken by the provider or user as a result of
10 the communications. In some cases, Airbnb account users will communicate directly
11 with Host of the location they have booked or are attempting to book. Airbnb may retain
12 such communications between the user and the Host regarding the location. Users are
13 expected to provide reviews of the location they booked, and Hosts are expected to
14 provide reviews of the User who booked the location. That information would be stored
15 and retained by Airbnb.

16 **INFORMATION TO BE SARCHED AND THINGS TO BE SEIZED**

17 36. Pursuant to Title 18, United States Code, Section 2703(g), this application
18 and affidavit for a search warrant seeks authorization to permit Airbnb, Inc., and its
19 agents and employees to assist agents in the execution of this warrant. Once issued, the
20 search warrant will be presented to Airbnb, Inc., with direction that it identifies the
21 Airbnb, Inc., account described in Attachment A to this affidavit, as well as other
22 subscriber and log records associated with the account, as set forth in Section I of
23 Attachment B to this affidavit.

24 37. The search warrant will direct Airbnb, Inc., to create an exact copy of the
25 specified account and records.

26 38. I, and/or other law enforcement personnel will thereafter review the copy of
27 the electronically stored data and identify from among that content those items that come
within the items identified in Section II to Attachment B, for seizure.

1 39. Analyzing the data contained in the forensic image may require special
2 technical skills, equipment, and software. It could also be very time-consuming.
3 Searching by keywords, for example, can yield thousands of “hits,” each of which must
4 then be reviewed in context by the examiner to determine whether the data is within the
5 scope of the warrant. Merely finding a relevant “hit” does not end the review process.
6 Keywords used originally need to be modified continuously, based on interim results.
7 Certain file formats, moreover, do not lend themselves to keyword searches, as keywords,
8 search text, and many common e-mail, database and spreadsheet applications do not store
9 data as searchable text. The data may be saved, instead, in proprietary non-text format.
10 And, as the volume of storage allotted by service providers increases, the time it takes to
11 properly analyze recovered data increases, as well. Consistent with the foregoing,
12 searching the recovered data for the information subject to seizure pursuant to this warrant
13 may require a range of data analysis techniques and may take weeks or even months. All
14 forensic analysis of the data will employ only those search protocols and methodologies
15 reasonably designed to identify and seize the items identified in Section II of Attachment
16 B to the warrant.

17 40. Based on my experience and training, and the experience and training of
18 other agents with whom I have communicated, it is necessary to review and seize a
19 variety of IP logs, registration e-mail addresses, source of payment, and documents, that
20 identify any users of the SUBJECT ACCOUNT.

21 //

22 //

23 //

CONCLUSION

41. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the government will execute this warrant by serving the warrant on Airbnb, Inc. Because the warrant will be served on Airbnb, Inc., who will then compile the requested records and data, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night. Accordingly, by this Affidavit and Warrant, I seek authority for the government to search all of the items specified in Section I, Attachment B (attached hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of the data, documents and records that are identified in Section II to the same Attachment.

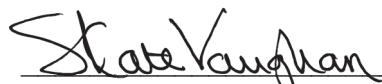
42. the affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

**GARRETT M
SAXTON**

Digitally signed by GARRETT
M SAXTON
Date: 2024.08.30 12:28:38
-07'00'

Garrett Saxton, Affiant
Special Agent, HSI

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on this 3rd day of September, 2024.


S. KATE VAUGHAN
United States Magistrate Judge

ATTACHMENT A**Property/Account to be Searched**

This warrant applies to electronically stored information contained in, related to, and associated with, including all preserved data associated with: Airbnb, Inc., account holder RICHARD MANESS and associated email **tonalsoul@gmail.com** and referred to as the Subject Account as well as other subscriber and log records associated with the Subject Account which is stored at a premises owned, maintained, controlled, or operated by Airbnb, Inc., (“Airbnb” or “Provider”), which received legal process at 888 Brannan Street, 4th Floor, San Francisco, CA 94103. Airbnb receives legal process via their Law Enforcement Service Site.

ATTACHMENT B**Particular Things to be Seized****Section I – Information to be disclosed by Airbnb, Inc., hereinafter “Provider” for search:**

1. the following information or data associated with the Airbnb account for **MANESS** with associated email **tonalsoul@gmail.com** (“Subject Account”), as described in Attachment A, which is within Airbnb, Inc.’s possession, custody, or control, including all records, files, logs, or information that have been deleted but are still available to Airbnb, Inc., or that have been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on August 29, 2024:

a. The contents of any communication or file stored by or for the Account(s) and any associated accounts, including, but not limited to, voice messages, text messages, multimedia messages, image files, video files, audio files, text files, content from any profile pages, and any information associated with those communications or files, such as the source and destination telephone numbers, e-mail addresses, or Internet Protocol (IP) addresses.

b. All records and other information relating to the Account(s) and any subscribers, customers, account holders, other Accounts, or other entities associated with the Account(s), including the following:

- subscriber names, user names, screen names, or other identities;
- mailing addresses, residential addresses, business addresses, e-mail addresses, and other contact information;
- length of service (including start date) and types of service utilized;
- records of user activity for any connections made to or from the Account(s), including the date, time, length, and method of connections and disconnections; session times and durations; electronic hardware devices used to connect; data transfer volume; user names; IP logs; source and destination IP addresses; and all other information related to the connections from the Internet Service Providers or their subsidiaries;

- 1 • the identities (including accounts and screen names) and subscriber information,
2 if known, for any persons or entities to which such connection information
3 relates;
- 4 • the identities (including accounts and screen names) and subscriber information,
5 if known, for any “friends” or contacts associated with the Account(s);
- 6 • telephone records, including local and long-distance telephone connection
7 records, caller identification records, cellular site and sector information, GPS
8 data, and cellular network identifying information (such as the IMSI, MSISDN,
9 IMEI, MEID, or ESN);
- 10 • telephone or instrument numbers (including MAC addresses);
- 11 • other subscriber numbers or identities, including temporarily assigned network
12 addresses and IP addresses used to register or set up the Account(s);
- 13 • billing records and means and source of payment for the Account(s), including
14 any credit card or bank accounts numbers;
- 15 • correspondence and other records of contact by any persons or entities about the
16 Account(s), such as “help desk” notes; and
- 17 • any other records or evidence relating to the Account(s).

18 2. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement
19 officer shall not be required for the service or execution of the search warrant.
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Section II – Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of 18 U.S.C. § 2422(b) (Enticement of a Minor), 18 U.S.C. § 2251(a), (e) (Production of Child Pornography), 18 U.S.C. § 2252(a)(2), (b)(1) (Receipt/Distribution of Child Pornography), and 18 U.S.C. § 2252(a)(4)(B), (b)(2) (Possession of Child Pornography), as well as attempt or conspiracy to commit such offenses committed in or after November 2023, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. All messages, documents, and profile information, attachments, or other data that serves to identify any persons who use or access the Subject Account, or who exercise in any way any dominion or control over the Subject Account;
- b. Evidence indicating the Subject Account owner's state of mind as it relates to the crimes under investigation;
- c. Any address lists or "friend"/contact lists associated with the Subject Account;
- d. Any messages, communications, or documents relating to the possession, transmission, solicitation or creation of visual depictions of minors engaged in sexually explicit conduct or the sexual exploitation or enticement of minors (including any attachments thereto);
- e. all contact and communication between the Subject Account and other "hosts", "co-hosts", or other individuals which took place on within the Airbnb application.
- f. All subscriber records associated with the Subject Account, including name, address, local and long-distance telephone connection records, or records of session times and durations, length of service (including start date) and types of service utilized, telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address, and means and source of payment for such service) including any credit card or bank account number;
- g. Any and all other log records, including IP address captures, associated with the Subject Account; and
- h. Any records of communications between Airbnb and any person about issues relating to the Subject Account, such as technical problems, billing inquiries, or complaints from other users about the specified accounts. This

1 to include records of contacts between the subscriber and the provider's
2 support services, as well as records of any actions taken by the provider or
3 subscriber as a result of the communications
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CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS PURSUANT
TO FEDERAL RULES OF EVIDENCE 902(13)

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C § 1746, that the information contained in this certification is true and correct. I am employed by Airbnb, Inc., and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Airbnb, Inc.. The attached records consist of _____ [GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)]. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Airbnb, Inc. and they were made by Airbnb, Inc. as a regular practice; and

b. such records were generated by Airbnb, Inc.'s electronic process or system that produces an accurate result, to wit:

1. The records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Airbnb, Inc. in a manner to ensure that they are true duplicates of the original records; and

2. The process or system is regularly verified by Airbnb, Inc., and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.